

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

RHEE BROS., INC.

\*

Plaintiff

\*

CIVIL ACTION NO. AMD 01CV 1894

v.

\*

HAN AH REUM, Corp., et al

\*

Defendants

\*

\* \* \* \* \*

STIPULATION FOR ENTRY OF PERMANENT INJUNCTION  
AND DISMISSAL

Plaintiff, Rhee Bros., Inc., ("Plaintiff") and Defendants (1) Seoul Shik Poom, Inc. and (2) Joong Kwon (jointly and severally "Defendants"), submit this Stipulation for Entry of Consent Permanent Injunction and Dismissal.

STIPULATION

On or about June 27, 2001, Plaintiff filed this action, titled Rhee Bros., Inc. v. Han Ah Reum, Corp., et al., AMD-01CV1894, in the United States District Court for the District of Maryland, against the Defendants<sup>1</sup>, seeking damages and injunctive relief for alleged trademark infringement ("this Action"). On or about October 29, 2001, Defendants filed their Answer and Counterclaim against Plaintiff. On or about January 4, 2002, Plaintiff filed its Amended Complaint. On or about February 20, 2002, Defendants filed their Amended Answer and Counterclaim. Defendants, without admitting or denying the alleged infringing activities in the Complaint and Amended Complaint, desire to settle all disputes with Plaintiff.

<sup>1</sup> Other defendants include HAR Wheaton, Inc., t/a Han Ah Reum, Han Ah Reum Corp., t/a Han Ah Reum, Il Yeon Kwon, individually (hereinafter jointly and severally "Defendant HAR").

1. Without admitting or denying the alleged infringing activities in the Complaint and in the Amended Complaint, Defendants, together with their agents, employees, and those acting in concert or with them who have authority to manage and control their business activities, stipulate and agree to be permanently enjoined and restrained from offering, selling, marketing, distributing and/or otherwise promoting, directly or indirectly,
  - a) products manufactured or packaged by Seoul Shik Poom, Inc., using the Plaintiff's trademark "Soon Chang Chap Sal Hot Bean Paste" under the brand name of Choripdong or any other brand name, and
  - b) any products manufactured, supplied or distributed by any third party using the Plaintiff's trademark "Soon Chang Chap Sal Hot Bean Paste."
2. Plaintiff stipulates and agrees that all claims alleged in the Plaintiff's Complaint and Amended Complaint against Defendants shall be and are dismissed from this action with prejudice.
3. Defendants stipulate and agree that all counterclaims alleged in the Defendants' Answer and Counterclaim, and Amended Answer and Counterclaim against Plaintiff shall be and are dismissed from this action with prejudice.
4. The Parties stipulate and agree that the Court shall retain jurisdiction of the action to entertain such further proceedings and to enter such further orders as may be necessary or appropriate to implement and/or enforce the provisions of this Order and the Parties' Confidential Settlement Agreement, which is incorporated by reference, and that this Order may be modified or vacated pursuant to the terms of the Confidential Settlement Agreement.

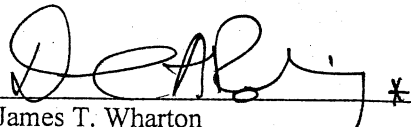
Respectfully submitted,

Dated:

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Jonathan Ilsong Ahn, Esq.  
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(410) 539-5040

Attorney for Plaintiff



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P. O. Box 551  
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(410) 363-5900

Attorneys for Defendants Seoul Shik Poom,  
Inc. and Joong Kwon

\* signed in accordance with the  
Court's June 21, 2003 order

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_ day of February, 2003, a copy of the foregoing Stipulation For Entry Of Consent Permanent Injunction and Dismissal was mailed, first class postage pre-paid, to the following Defendants:

Stephen C. Leckar, Esq.  
Butera & Andrews  
1301 Pennsylvania Avenue, N.W., Suite 500  
Washington, D.C. 20004

Benjamin Lambiotte, Esq.  
Garvey Schubert & Barer  
1000 Potomac Street, N.W., 5<sup>th</sup> Floor  
Washington, D.C. 20007

Attorneys for Defendants Han Ah Reum, Corp.  
t/a Han Ah Reum, HAR Wheaton, Inc., t/a Han Ah Reum,  
and Il Yeon Kwon, individually

H. Patrick Stringer, Esq.  
Mudd, Harrison & Burch  
105 W. Chesapeake, Suite 300  
Towson, MD 21204

Attorneys for Defendant HAR Wheaton, Inc.  
t/a Han Ah Reum

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Jonathan Ilsong Ahn

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
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RHEE BROS., INC.

Plaintiff

CIVIL ACTION NO. AMD 01CV 1894

v.

HAN AH REUM, Corp., et al

Defendants

\* \* \* \* \*

CONSENT ORDER OF PERMANENT INJUNCTION AND DISMISSAL

The Court having read and considered the Stipulation for Entry of Consent Permanent Injunction and Dismissal, which has been duly executed by Plaintiff, Rhee Bros., Inc. and Defendants (1) Seoul Shik Poom, Inc., and (2) Joong Kwon (jointly and severally "Defendant-SSPs"); and good cause appearing therefor, hereby ORDERS that a PERMANENT INJUNCTION shall be and is hereby entered in the within action as follows:

1. Without admitting or denying the alleged infringing activities in the Complaint and in the Amended Complaint, Defendants Seoul Shik Poom, Inc. and Joong Kwon, together with their agents, employees, and those acting in concert or with them who have authority to manage and control their business activities, are hereby permanently enjoined and restrained from offering, selling, marketing, distributing and/or otherwise promoting, directly or indirectly,
  - a) products manufactured or packaged by Seoul Shik Poom, Inc., using the Plaintiff's trademark "Soon Chang Chap Sal Hot Bean Paste" under the brand name of Choripdong or any other brand name, and
  - b) any products manufactured, supplied or distributed by any third party using the

Plaintiff's trademark "Soon Chang Chap Sal Hot Bean Paste."

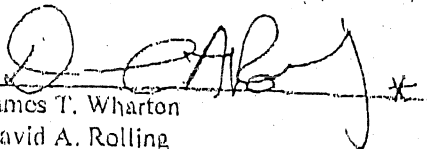
2. All claims alleged in the Plaintiff's Complaint and Amended Complaint against Defendant-SSPs shall be and are dismissed from this action with prejudice.
3. All counterclaims alleged in the Defendant-SSPs' Answer and Counterclaim, and Amended Answer and Counterclaim against Plaintiff shall be and are dismissed from this action with prejudice.
4. The Court shall retain jurisdiction of the action to entertain such further proceedings and to enter such further orders as may be necessary or appropriate to implement and/or enforce the provisions of this Order and the Parties' Confidential Settlement Agreement. This Order may be modified or vacated pursuant to the terms of the Confidential Settlement Agreement.

United States District Judge

Date/Time: \_\_\_\_\_

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Attorneys for Defendants Seoul Shik Poom,  
Inc. and Joong Kwon

\* Signed in accordance with Court's  
June 21, 2003 order